

# CITY OF SEBASTOPOL

City Hall

7120 Bodega Avenue

Post Office Box 1776

Sebastopol, CA 95473-1776

707-823-1153 - Phone

707-823-1135 - Fax

Email: [mgourley@sonic.net](mailto:mgourley@sonic.net)

Web Site: [www.ci.sebastopol.ca.us](http://www.ci.sebastopol.ca.us)



**SEBASTOPOL**

Local Flavor, Global Vision.



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Dave Brennan

**CITY CLERK/PROGRAM MANAGER**

Mary Gourley

**MAYOR**

Sarah Glade Gurney

**CITY COUNCIL**

Linda Kelley, Vice Mayor

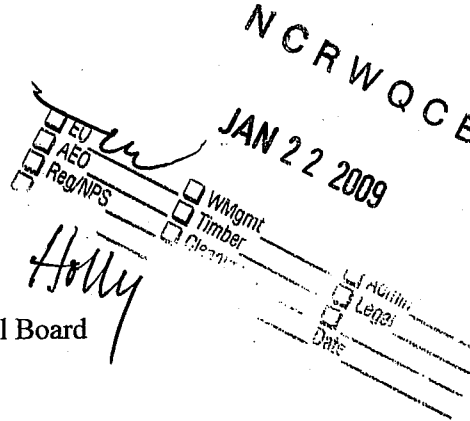
Larry Robinson

Kathleen Shaffer

Guy Wilson

January 21, 2009

Ms. Catherine Kuhlman, Executive Officer  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd, Suite A  
Santa Rosa, CA 95407



Dear Ms. Kuhlman,

The purpose of this letter is to indicate the support of the Sebastopol City Council for the proposed *Basin Plan Amendment to Establish Exception Criteria to the Point Source Waste Discharge Prohibitions by Revising the Action Plan for Storm Water Discharges and adding a new Action Plan for Low Threat Discharges*. The City of Sebastopol is a partner with the City of Santa Rosa in the Santa Rosa Subregional Water Reclamation System, and is also subject to the Phase 2 Stormwater permit. Many of the activities addressed by the proposed Low Threat Discharge BPA occur in our City, including construction dewatering, well testing, water distribution system maintenance, irrigation, residential swimming pool draining, and non-commercial car washing, among others.

We support the Low Threat BPA because it will address conflicts between regional and statewide permits and the Basin Plan prohibitions and to remove obstacles to routine operational activities in Sebastopol, and habitat restoration and water recycling projects that would have a beneficial effect on North Coast watersheds and the regional economy. We concur with the Board's Staff Report, which concludes that the proposed Low Threat BPA will provide a higher degree of water quality protection by acknowledging that these low threat discharges exist and providing a regulatory program that allows the discharges to occur under prescribed conditions. The proposed Low Threat BPA appears to provide the necessary flexibility to permit writers to take into account project-specific factors such that only those controls necessary to protect water quality will be required.

The City commends Regional Water Board staff for bringing this important policy matter to the Board for consideration and thanks the Board for making this possible. Thank you for your consideration of our comments.

Sincerely,

*Sarah Glade Gurney*  
Sarah Glade Gurney, Mayor

Cc: City Manager  
Engineering Director